

UNITED STATES DISTRICT COURT

for the
Eastern District of Missouri

In the Matter of the Search of

Priority Mail parcel 9505 5145 5779 3226 8277 87 addressed to
"Levi Franklin 423 S. 23rd St. Mt Vernon, IL 62864" with return
address of "Liam Weber 3180 Via Dolce, Unit 7 Marina Del Rey,
CA 90292."

)

Case No. 4:23 MJ 9185 RHH
SIGNED AND SUBMITTED TO THE COURT BY
RELIABLE ELECTRONIC MEANS
FILED UNDER SEAL

APPLICATION FOR A SEARCH WARRANT

I, William H. Ware, a federal law enforcement officer or an attorney for the government
request a search warrant and state under penalty of perjury that I have reason to believe that on the following property:Priority Mail parcel 9505 5145 5779 3226 8277 87 addressed to "Levi Franklin 423 S. 23rd St. Mt Vernon, IL 62864" with return address of "Liam
Weber 3180 Via Dolce, Unit 7 Marina Del Rey, CA 90292."

located in the EASTERN District of MISSOURI, there is now concealed

controlled substances and/or United States Currency

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

evidence of a crime;
 contraband, fruits of crime, or other items illegally possessed;
 property designed for use, intended for use, or used in committing a crime;
 a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

21:841(a) & 846

Offense Description

Possession with intent to distribute a controlled substance

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE

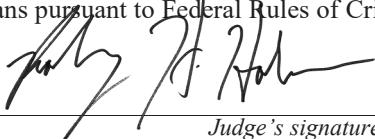
Continued on the attached sheet.
 Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested
under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.
I state under penalty of perjury the forgoing is true and correct.


 Applicant's signature

Postal Inspector William H. Ware, USPIS

Printed name and title

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41.


 Judge's signature

Date: August 17, 2023

City and state: St. Louis, MO

Honorable Rodney H. Holmes, U.S. Magistrate Judge

Printed name and title

AUSA: REA

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, William H. Ware, being duly sworn, state the following:

1. I am a U.S. Postal Inspector with the United States Postal Inspection Service (USPIS). I have been employed by the USPIS since January of 2022. I have been assigned to the Contraband Interdiction and Investigations Team (CI2) at the St. Louis, Missouri Field Office since graduating the USPIS' federally accredited academy in Potomac, Maryland. The CI2 team focuses on dismantling drug trafficking organizations through investigations focusing on the interdiction and investigation of illicit narcotics and illicit narcotics proceeds. The CI2 team has intercepted numerous parcels that were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity. I have received advanced training in the investigation of controlled substances and/or the proceeds/payments from the trafficking of controlled substances throughout the United States. Prior to my employment with the USPIS, I attended the St. Louis County Police Academy in 2019, and was a commissioned police officer in Missouri from 2019 until 2022. As a commissioned officer, I was a Patrol Officer for two years.

2. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U.S. Postal Service (USPS) Express Mail and Priority Mail are frequently utilized by drug traffickers for the shipping illicit drugs and/or proceeds/payments derived from illicit drug trafficking. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail - overnight; Priority mail - two-day delivery), reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Express Mail was originally intended for urgent, business-to-business, correspondence.

3. Information gathered by the USPIS has also demonstrated that other delivery couriers, such as Federal Express (FedEx) and United Parcel Service (UPS), are frequently utilized

by drug traffickers for the shipping of illicit drugs or proceeds/payments. Information gathered by the USPIS has demonstrated that the services and delivery practices of FedEx and UPS are similar to USPS Express Mail and Priority Mail. Like USPS Express Mail and Priority Mail, FedEx and UPS are favored because of the speed, reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Like USPS Express Mail and Priority Mail, FedEx and UPS were originally intended for urgent, business-to-business, correspondence. However, intelligence from prior packages that were found to contain illicit drugs or proceeds/payments has indicated that these shipping labels are usually from an individual to an individual. FedEx and UPS are seldom utilized to convey individual-to-individual correspondence.

4. I am also aware from previous investigative experience and training that those engaged in the movement of illicit drugs through U.S. mail or other parcel carrying and delivery services such as FedEx or UPS often use a network of available delivery “drop” addresses to vary delivery or sending locations and frequency in an attempt to avoid law enforcement attention. These “drop” addresses may include true residences of co-conspirators, associates, or relatives. Shipments of illicit drugs are often broken up into multiple parcels destined for the same or multiple addresses in further efforts to avoid detection. Though the sender information may be fictitious, illicit drugs proceeds parcels are often addressed to a true person and/or true address to ensure the receipt and security of bulk cash or monetary instrument mailings.

5. To combat the flow of illicit drugs or illicit drug proceeds through the overnight and/or two to three-day delivery services, interdiction programs have been established in cities throughout the United States by the USPIS, including the Saint Louis Metropolitan Area. These cities have been identified as known sources of, and destinations for, illicit drugs or illicit drug proceeds. The USPIS conducted an analysis of prior packages mailed through overnight and/or

two- to three-day delivery services that contained controlled substances or proceeds/payments of controlled substance sales. The analysis of those prior packages indicated that these labels are usually from an individual to an individual. In the few cases when overnight, and or two- to three-day delivery service packages containing controlled substances or proceeds/payments have displayed a business or company name, it has usually proven to be a fictitious business or company, or the business listed is not associated with the mailer and was randomly selected by the mailer to deter law enforcement detection. In such instances, Postal Inspectors review available business records to verify the postage payment utilized by the mailer.

6. Most business mailings sent via USPS or through other private couriers reflect a pre-established postage meter or other various lines of credit to pay for the postage. Additionally, during the Silk Road investigation (dark web investigation that provided avenues to customers to order narcotics via the internet), the USPIS learned that unknown persons posted intelligence on the Silk Road website warning would be drug mailers that most USPIS search warrant affidavits for illicit drug proceeds packages reflect mailing labels written as person-to-person and bore fictitious addressee and sender names. Due to the posting on the Silk Road Website, USPIS has noticed an increased number of packages utilizing valid sender and addressee names and or valid business names on narcotics/narcotics proceeds packages. Recent analysis has also shown that whether the mailer utilized a legitimate name/business on a mailing label or a fictitious name on the mailing label, cash payment for postage is the method of payment for most narcotics/narcotics proceeds parcels. USPIS analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the package will contain illicit drugs or the proceeds of illicit drug trafficking. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to

include USPS Express Mail, USPS Priority Mail, FedEx, and UPS. This profile includes the following characteristics: package mailed from or addressed to an illicit drug source city; package has a fictitious or misused return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information that is handwritten; package is mailed from a Commercial Mail Receiving Agency (CMRA); package is addressed to residential areas; package is addressed from an individual to an individual; packages are wrapped in brown paper and/or heavily taped; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address, and or any other characteristic previously noted in this paragraph.

7. The USPIS St. Louis Field Office's CI2 Team has found the characteristics listed in paragraphs three, four, five, and six are indicative of packages which have been found to contain illicit drugs or the proceeds/payments for the trafficking of illicit drugs.

8. This affidavit is submitted for the limited purpose of establishing probable cause for the search warrant sought. I have not set forth every fact known to me concerning this investigation. I have included what I believe are facts sufficient for the present purpose. The information contained in this affidavit is based upon my personal knowledge and investigation, as well as information conveyed to me by other law enforcement agents and employees.

Probable Cause

9. On August 15, 2023, utilizing USPS business databases, I noticed Priority Mail parcel **9505 5145 5779 3226 8277 87** (hereinafter referred to as the "**Subject Package**"), which was being mailed from the known narcotics source state of California, on August 14, 2023, and was destined to arrive at 423 S. 23rd Street, Mount Vernon, IL 62864, on August 17, 2023. The USPS databases indicated the **Subject Package** weighed approximately three pounds and five

ounces.

10. On August 16, 2023, I responded to USPS Hazelwood, Missouri Network Distribution Center (NDC) and located the **Subject Package**. I observed the **Subject Package** to be a white USPS Priority Mail cardboard box measuring approximately 12.25 x 12 x 6 inches. The **Subject Package** was addressed to “Levi Franklin 423 S. 23rd St. Mt Vernon, IL 62864” from “Liam Weber 3180 Via Dolce, Unit 7 Marina Del Rey, CA 90292” in handwritten black marker directly onto the parcel. The package’s labeling indicates that the originating Post Office for the package is in Venice, California and cost \$22.80 to ship. The overall characteristics were consistent with characteristics of previous USPS packages that have contained narcotics or the proceeds of narcotics, as mentioned in previous paragraphs. Likewise, based on my training and experience, I know that California is an illicit drug source state. Due to these characteristics, the **Subject Package** was detained for further review to verify the validity of the addressee listed on the mailing label and further inspect the parcel.

11. A search of open source and law enforcement databases revealed no association with “Levi Franklin” at address “423 S. 23rd St. Mt Vernon, IL 62864.” A further search revealed no association with “Liam Weber” at address “3180 Via Dolce, Unit 7 Marina Del Rey, CA 90292.” No names are associated with ”3180 Via Dolce, Unit 7 Marina Del Rey, CA 90292,” and it appears to be a fictitious address. A review of Postal Service databases showed the **Subject Package** had been paid for with cash. After reviewing USPS business records and available law enforcement databases, and due to the characteristics associated with the **Subject Parcel** set forth above, I contacted USPIS Task Force Officer Mason McNail (TFO McNail), who is a canine handler, to present the **Subject Package** to canine Tobi. TFO McNail and his illicit drug detection canine, Tobi, responded to the USPIS St. Louis Field Office. The **Subject Package**, as well as

other packages, were placed in a secure room at the St. Louis Field Office not previously known to be contaminated with the presence of any illicit drug odors. TFO McNail advised that canine Tobi alerted to the **Subject Package** upon arriving at it, indicating the presence of an odor of an illicit drug that canine Tobi is trained to detect.

12. TFO McNail provided a copy of canine Tobi's qualification certification dated July 17, 2023, which is attached to this affidavit.

13. Based on my training and investigative experience, as well as the training and investigative experience of other members of the USPIS St. Louis CI2 Team, I know that the size and weight of the **Subject Package**, coupled with other indicators (person-to-person mailing Priority Mail label; handwritten recipient information addressed to an individual in a residential area; fictitious or incomplete sender information; fictitious or incongruent displayed recipient information; mailing from a known source illicit drug city/state; and a positive reaction by an illicit drug trained canine), are indicators that the **Subject Parcel** will likely contain illegal narcotics, monies, or monetary instruments which are the proceeds/payments of drug trafficking, as has been the case with other packages seized and searched in the past possessing the same or similar indicators.

14. From my training and experience as well as consultation with the United States Attorney's Office, I am aware that:

a. Title 21, United States Code, Section 841 makes it unlawful for any person to knowingly or intentionally distribute or possess with the intent to distribute a controlled substance.

- b. Title 21, United States Code, Section 843(b) makes it unlawful for any person knowingly or intentionally to use any mail (communication) facility in the distribution of illicit drugs.
- c. Title 21, United States Code, Section 846 makes it unlawful to attempts or conspires to commit the above acts.

15. Given the facts and circumstances above, it is my belief that the **Subject Package** will contain narcotics in violation of one or more of the United States Codes listed above. Upon execution of the search warrant, I will provide the court with documentation of my findings.

16. The **Subject Package** is currently in the custody of U.S. Postal Inspector William Ware in the Eastern District of Missouri. Also attached herewith is a picture of the mailing label for the **Subject Package**.

17. Because this investigation is ongoing and its success would be jeopardized if the contents of this affidavit were made public, Inspectors request that this affidavit be sealed until further order of the Court.

I state under penalty of perjury that the foregoing is true and correct.



William H. Ware
U.S. Postal Inspector

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 this 17th day of August 2023.



HONORABLE RODNEY H. HOLMES
United States Magistrate Judge
Eastern District of Missouri



UNITED STATES
POSTAL SERVICE®

PRIORITY
MAIL

Retail



U.S. POSTAGE PAID

PM

VENICE, CA 90291

REGULAR RATE

AUG 14, 2023



62864

\$22.80

RDC 01

3 Lb 4.10 Oz

R2305K137880-17

FROM:

Liam Weber

3180 Via Dolce, UNIT 7
Marina Del Rey, CA 90292

VISIT US AT USPS.COM®
ORDER FREE SUPPLIES ONLINE

TO:

Levi Franklin
423 S. 23rd St.
Mt Vernon, IL 62864

LARGE FLAT RATE BOX
FOR DOMESTIC AND INTERNATIONAL USE

EXPECTED DELIVERY DAY: 08/17/23

USPS TRACKING® #



9505 5145 5779 3226 8277 87

3 July 2022
2 x 11.75 x 5.5
12.25 x 12 x 6
CUFT: 0.510

To schedule free
Package Pickup,
scan the QR code.



USPS.COM/PICKUP

North County Police Cooperative
Bureau of Criminal Investigations Canine Detective
Canine Probable Cause Affidavit of Qualifications
Handler: Detective Mason McNail, DSN 373
Canine "Tobi"

I, Detective Mason McNail, DSN 373, have been a Commissioned Police Officer with the North County Police Cooperative since January of 2021. I have previously amassed 25 years of police and narcotics experience while employed by the Lincoln County Sheriff's Office, Richmond Heights Police Department, and the St. Ann Police Department. I was also assigned to the Drug Enforcement Administration as a Task Force Officer from 2013 to 2017. I have completed 960 hours of Missouri P.O.S.T. required Law Enforcement Academy requirements. Canine "Tobi" and I are currently assigned to the North County Police Cooperative Bureau of Criminal Investigations, as well as the United States Postal Inspection Service.

Canine Tobi is a brindle colored, male, Dutch Shepherd. He was born on June 10, 2018. Canine Tobi and I attended and completed the "Narcotics Detection" training course from August 2, 2020 through August 14, 2020. This course was held at F.M. K9, located in Berrien Center, Michigan. The training course consisted of two weeks of instruction in the application of canine obedience, narcotics/controlled substance detection, and article search. Canine Tobi and I were last certified by the International Police Work Dog Association (IPWDA) as an accredited Narcotic Detection Canine team on July 12, 2023.

Canine Tobi has been trained to sniff and alert to the distinctive odors of controlled substances including: Heroin, Cocaine, Methamphetamine, Fentanyl, MDMA, and Marijuana. Canine Tobi alerts to these odors in a passive manner and exhibits a significant change in behavior by sitting, standing, or laying at, or as close as he can get to, the source of the odor.

Since Canine Tobi and I began working, he has been responsible for the seizure of approximately 255.114 kilograms of marijuana, approximately 83.664 kilograms of methamphetamine, 25.353 kilograms of fentanyl, 15.982 kilograms of cocaine, approximately 2.8 grams of LSD, 19.263 kilograms of Psilocybin, 4.944 kilograms of Promethazine, 2.534 kilograms of Ecstasy, 16 grams of Heroin, 606.9 grams of Xanax, 56.699 grams of crack cocaine, and 13 firearms. Canine Tobi has also been responsible for the seizure of approximately \$1,172,711 in smuggled bulk US Currency and Money Orders.

Canine Tobi and I train a minimum of 16 hours per month, in the areas of narcotic detection, obedience, tracking, and article searches with the Maryland Heights Police Department, St. Charles Police Department, certified trainers, other canine programs, and/or on our own time.

This affidavit is current as of July 17, 2023.

Detective Mason McNail, DSN 373
North County Police Cooperative
Bureau of Criminal Investigations
8027 Page
St. Louis, MO
314-427-8000